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November 12, 2007

Via E-Mail and First Class Mail

Kim Muratore
 Case Developer (SFD-7-S)
 U.S. E.P.A., Region 9
 75 Hawthorne Street
 San Francisco, CA 94105

Re: *Information Request Letter for the San Fernando Valley/North Hollywood
 Superfund Site, North Hollywood, California*

Dear Ms. Muratore:

Please be advised that this firm has been asked to respond to your Information Request (dated September 11, 2007) regarding the San Fernando Valley Area 1, North Hollywood Operable Unit (herein "NHOU") on behalf JAC-NUP Corporation ("JAC-NUP"). All further correspondence relating to this request should be directed to the undersigned.

Please be aware that JAC-NUP Corporation is not an active operating entity as is described further below, and as such, we can only supply limited information as set forth herein.

Information Request No. 1:

State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answer any of the questions below on behalf of JAC-NUP Corporation, f/k/a Nupla Corporation (the "Company").

Response to Information Request No. 1:

The assets of NUPLA Corporation were sold to "NUPLA Acquisition Corporation" ("NAC") in December 2002. In 2003, NUPLA Corporation ("Old NUPLA") then changed its name to "JAC-NUP Corporation" and NAC then changed its name to NUPLA Corporation which has no relationship with the JAC-NUP and will referred to herein as "New NUPLA".

JAC-NUP ceased any operation in December 2002, JAC-NUP as a liquidating shell will likely be wound up and liquidated in the next year.

The person responding at this time to these questions is David Lee Isackson; MAC N9305-098, Sixth & Marquette Ave., Mpls, MN 55479; Vice President of JAC-NUP since 2002. Telephone number 612-667-8839

Information Request No. 2:

Please provide one or more contact names and current contact information (address and phone number) and for individuals within the company who are familiar with the Consent Decree and the basis for the Company's involvement as a signatory to the Consent Decree.

Response to Information Request No. 2:

At this time JAC-NUP is unable to respond. However, JAC-NUP understands that Old NUPLA did settle an alleged liability with the EPA relating to the NHOU. See Response to Request Nos. 3 and 4 below. Therefore, JAC-NUP believes that the EPA is in a better position to respond to this request than is JAC-NUP.

Information Request No. 3:

The Consent Decree defines Nupla Corporation as a "Settling Defendant." Describing it as a party who was not sued by the governments but who was related to one or more of the other defendants or to the property where such other defendants operated. (Section II.O). Please explain the circumstances under which the Company was originally brought into the litigation and/or negotiations surrounding the Consent Decree, including the identity of the party who brought the Company into litigation, a description of the relationship between the Company and such party or property, and a summary of the reasoning or claims alleged by such party as basis for the Company's involvement.

Response to Information Request No. 3:

At this time JAC-NUP is unable to respond. However, JAC-NUP understands that Old NUPLA did settle an alleged liability with the EPA relating to the NHOU. All the records and files regarding this matter were turned over to New NUPLA at the sale, and had possession and control of such records and files after that time. All employees of JAC-NUP were terminated at the time of sale. New NUPLA rehired most of the Old NUPLA/JAC-NUP employees. Therefore, JAC-NUP believes that the EPA is in a better position to respond to this request than is JAC-NUP, as there is no person currently employed by JAC-NUP that has such information.

Information Request No. 4:

Identify the individuals who are or were responsible for environmental matters at the Company's facility located at 11912 Sheldon Street, Sun Valley, California (the "Facility"). Henceforth, the term "Facility" shall be interpreted to include both the real property at 11912 Sheldon Street and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone

number, position titles, and the dates each individual held such position.

Response to Information Request No. 4:

Currently, JAC-NUP has no information as to whether or not New NUPLA was served with an Information Request and/or if they did, whether their response contains any relevant information as is being sought in this specific request. Notwithstanding this, JAC-NUP believes that a Mr. Jody Hill, Nupla Corporation whose phone number is 818 768 6800 at Ext. 714 may have some information concerning operations of the New NUPLA post December 2002. He was a former employee of the Old NUPLA. Mr. J. Alan Carmein, the owner and president of the Old NUPLA is deceased (November 1, 2001). JAC-NUP has no person currently employed that has such information

Information Request No. 5:

Explain the Company's present operational status (e.g., active, suspended, defunct, merged, or dissolved.

Response to Information Request No. 5:

JAC-NUP ceased operation in December, 2002. JAC-NUP is a liquidated shell and likely will be wound up and liquidated in the next year.

Information Request No. 6:

Provide the date the Company was incorporated, formed or organized. Identify the State in which the Company was incorporated, formed or organized.

Response to Information Request No. 6:

At this time, the response is uncertain due to the death of Mr. Carmein. JAC-NUP is currently incorporated in Delaware. Old NUPLA was apparently formed in California in the 1930's or 1940's as New Plastic and some time thereafter the name was changed.

Information Request No. 7:

Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates and identify all former business structures under which it existed or operated at the Facility.

Response to Information Request No. 7:

Corporation.

Information Request No. 8:

For each business structure under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure, the name(s) it used, and the Facility addresses at which it operated or was otherwise located.

Response to Information Request No. 8:

See Response to Information Request No. 6. JAC-NUP's current address is in 333 Market Street, San Francisco, CA. The Old NUPLA's address was 11912 Sheldon, Sun Valley, CA.

Information Request No. 9:

Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.

Response to Information Request No. 9:

To the extent such documents are available, JAC-NUP will provide such documents under separate cover. Documents are either in storage or may have been destroyed in a fire which took place in the late 1960's or early 1970's at the Sun Valley address provided above.

Information Request No. 10:

If the Company is or was operating under a fictitious business name at the Facility, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.

Response to Information Request No. 10:

It is believed that Old NUPLA never operated at the Facility under a fictitious name. JAC-NUP has never operated under a fictitious name.

Information Request No. 11:

Provide the dates the Company, under any of its current or former business structures, owned the Facility. Identify all parcel numbers and street addresses associated with the Facility and provide a copy of the title documentation evidencing the Company's ownership of the Facility.

Response to Information Request No. 11:

Neither Old NUPLA nor JAC-NUP ever owned the Facility.

Information Request No. 12:

For any period of time in which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessees. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.

Response to Information Request No. 12:

See Response to Information Request No. 11. Documents that are available are being obtained and will be provided under separate cover.

Information Request No. 13:

Provide the dates that the Company, under any of its current or former business structures, operated the Facility. Identify all parcels or real property involved in the Company's operations at the Facility, including all street addresses associated therewith.

Response to Information Request No. 13:

JAC-NUP has never operated the Facility. Old NUPLA operated at the Facility for its entire time of existence.

Information Request No. 14:

For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, the Facility, provide the name, address and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.

Response to Information Request No. 14:

JAC-NUP never operated the Facility. As far as can be ascertained at this time, the Old NUPLA leased the Facility from the Carmein 1991 Trust subsequent to the formation of the Trust in 1991. Prior to that time, it is believed Mr. Carmein may have owned the property himself. That Trust's address was and is 433 North Camden Drive, Beverly Hills, 12th Floor, CA 90210. Thereafter, Carmein 1991 Trust continued to own the Facility. However, after Mr. Carmein's death, the Facility ownership passed into various sub-trusts. Subsequently, in and around 2004, the Facility ownership passed to 11912 Sheldon Property, LLC. That entity's address is the Beverly Hills address above.

Information Request No. 15:

Identify any individual or entity that owned or operated the Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:

- a. The dates of the ownership/operation;
- b. The nature of prior or subsequent operations at the Facility;
- c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and
- d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.

Response to Information Request No. 15:

Mr. Carmein operated at the Facility for an unknown period of time likely commencing in the 1960's. (See above for other history). Neither Old NUPLA nor JAC-NUP has ever owned the Facility. At this time, JAC-NUP has no person currently employed by JAC-NUP that has such information.

Information Request No. 16:

Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provide the following information:

- a. The employee's full name;
- b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
- c. The dates the employee worked at the Facility;
- d. The position(s) the employee held under any of the Company's business structures; and
- e. The employee's job title(s) and the corresponding dates during which the Company believes that the employees would have had knowledge of the use and disposal of wastes.

Response to Information Request No. 16:

See Response to Information Request No. 4 above.

Information Request No. 17:

Describe the size of the Facility, the approximate number of people employed by the

Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.

Response to Information Request No. 17:

JAC-NUP is aware that the Facility is 52,800 square feet office and manufacturing facility occupying 3.7 acres. JAC-NUP is likewise aware that Old NUPLA manufactured handles for hand tools and attached various product heads to those handles, and believes, as the New NUPLA bought the assets of Old NUPLA, it continued this work. JAC-NUP notes that the website of the New NUPLA indicates that they do make handles for hand tools. See <http://www.nuplacorp.com>. JAC-NUP has no person currently employed that has any further information. See attached sketch.

Information Request No. 18:

If any substance containing chromium as a component ("chromium-related substances") was utilized in any of the Company's operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company's operations at the Facility for materials containing chromium. Including documentation evidencing the Company's use of chromium or chromium-related substances.

Response to Information Request No. 18:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 19:

Provide a scaled map of the Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

- a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.)
- b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.)
- c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
- d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);

- e. Any and all additions, demolitions or changes or any kind to physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
- f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including, but not limited to, dumps, leach fields, and burn pits.

Response to Information Request No. 19:

While not to scale, please see attached sketch. Also please see Response to Information Request No 3 above regarding such documents.

Information Request No. 20:

Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies regarding operations at the facility.

Response to Information Request No. 20:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 21:

Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.

Response to Information Request No. 21:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 22:

Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; 1,4-DCA, *cis*-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodimethylamine (NDMA); perchlorate; dioxins and furans, which are or were used at, or transported to, the Facility:

- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Date Sheet for each product;
- b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;

- c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance.
- d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
- e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, cancelled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.

Response to Information Request No. 22:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 23:

A search of Superfund Records Center records found copies of the following environmental or monitoring reports for the Facility previously provided to EPA: April 1993 Limited Subsurface Environmental Assessment Investigation Report; August 20, 1993 Soil Gas Survey Report; March 25, 1994 Site Assessment Report for Nested Soil Gas Probe Installation; September 29, 1994 Report on Monitoring of Nested Probes (Second Episode); and April 11, 1995 Report on Monitoring of Nested Probes (Third Episode). Other than these five reports, provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.

Response to Information Request No. 23:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 24:

Identify, and provide the following information for, all groundwater wells that are located at the Facility:

- a. A map with the specific locations of the Facility groundwater wells;
- b. Date the Facility groundwater wells are sampled;
- c. List of all constituents which were analyzed during groundwater sampling events;
- d. All groundwater sampling results, reports of findings, and analytical data.

Response to Information Request No. 24:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 25:

Provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system.

Response to Information Request No. 25:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 26:

If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.

Response to Information Request No. 26:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 27:

For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

Response to Information Request No. 27:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 28:

Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to the transport to a disposal site.

Response to Information Request No. 28:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 29:

Please describe the method used by the Company to remove waste streams from sumps at the Facility.

Response to Information Request No. 29:

See Response to Information Request Nos. 3 and 4 above.

11/12/07
KIM MURATORE
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Information Request No. 30:

Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.

Response to Information Request No. 30:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 31:

Please identify all leaks, spills, or other releases into the environment of any hazardous substances, or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:

- a. The date each release occurred;
- b. The cause of each release;
- c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
- d. Where each release occurred and what areas were impacted by the release; and
- e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

Response to Information Request No. 31:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 32:

Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility, including but not limited to, any correspondence concerning any of the releases identified in response to the previous question.

Response to Information Request No. 32:

See Response to Information Request Nos. 3 and 4 above.

Information Request No. 33:

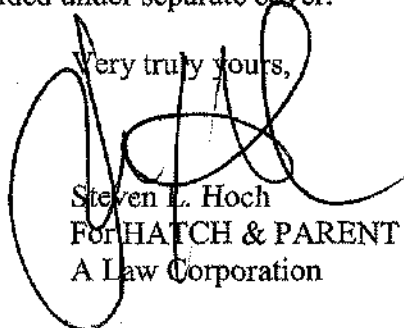
Information provided to EPA indicates that business using the name of Nupla Corporation have been operating at the Facility since approximately 1940, but that in or about 2003 the Company sold the business to another company then known as Nupla Acquisitions Corporation. California corporate records show that this corporation changed its name to Nupla Corporation in July 2003 and continued to operate at the Facility under this name. Please

provide a description of this 2003 transaction and provide copies of all documents which evidence this transaction, including but not limited to, asset purchase agreements, stock purchase agreements, and merger agreements. In addition, please provide copies of any agreement executed in connection with this transaction which deals with the retention or transfer and assumption of environmental liabilities associated with the Company's operations at the Facility.

Response to Information Request No. 33:

See Response to Information Request No. 1 above. Documents that are available are being obtained and will be provided under separate cover.

Very truly yours,



Steven L. Hoch
FOR HATCH & PARENT
A Law Corporation

SLH:ibc

cc: Elizabeth Cox (via First Class mail)
Rachel Loftin (via electronic mail)
Michael Massey (via electronic mail)

office/lunchroom

Manufacturing/Warehouse
+/- 20,800 SF

80'
260'

Excess Land
area

Manufacturing/Warehouse
+/- 32,160

80'
402'

office
building
± 2,100 SF

70'
30'

+/- office area
6,771 SF

3'

utility

Sheldon Street